

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

HOLCOMBE, et. al,

Plaintiffs

vs.

UNITED STATES OF
AMERICA,

Defendant

NO. 5:18-CV-00555-XR

(consolidated cases)

JOINT MOTION TO EXTEND DEADLINE

Parties would respectfully ask the Court to extend the deadline for filing proposed judgments to:

- Feb. 22, 2022, for Plaintiffs to file proposed judgments;
- Mar. 4, 2022, for Defendant to file any objections.

The Court has discretion to extend these deadlines pursuant to Federal Rule of Civil Procedure 6(b); *see also Chudasama v. Mazda Motor Corp.*, 123 F.3d 1353, 1366 (11th Cir. 1997) (“We recognize that district courts enjoy broad discretion in deciding how best to manage the cases before them.”); *Cable/Home Commc’n Corp. v. Network Prods., Inc.*, 902 F.2d 829, 859 (11th Cir. 1990) (discussing discretion afforded to district courts when ruling on requests for enlargements of time). Parties have good cause for this request and is not intended to delay. Plaintiffs and the United States are working together to potentially file a joint judgment proposal but need additional time to reach a final agreement.

Thus, Parties jointly request the Court enter the attached proposed order, extending the Parties' time to file proposed judgments.

Respectfully Submitted,

/s/ Clayton Diedrichs

Clayton R. Diedrichs
US Attorney's Office
601 N. W. Loop
410; Suite 600
San Antonio, TX 78216

Attorney for the United States

/s/ Jamal K. Alsaffar

Jamal K. Alsaffar
JAlsaffar@nationaltriallaw.com
Texas Bar No. 24027193
Tom Jacob
TJacob@nationaltriallaw.com
Texas Bar No. 24069981
**Whitehurst, Harkness, Brees, Cheng,
Alsaffar & Higginbotham & Jacob
PLLC**
7500 Rialto Blvd, Bldg. Two, Ste 250
Austin, TX 78735
Office 512-476-4346
Fax 512-476-4400
Counsel for Vidal, McKenzie, Solis,
McNulty, and Wall

/s/ Jason P. Steed

Jason P. Steed
JSteed@kilpatricktownsend.com
Texas Bar No. 24070671
**Kilpatrick Townsend & Stockton
LLP**
2001 Ross Avenue, Suite 4400
Dallas, TX 75201
Office 214-922-7112
Fax 214-853-5731
Counsel for Vidal, McNulty, and Wall

/s/ April A. Strahan

April A. Strahan

april@ammonslaw.com

Texas Bar No. 24056387

Robert E. Ammons

rob@ammonslaw.com

Texas Bar No. 01159820

The Ammons Law Firm

3700 Montrose Blvd.

Houston, TX 77006

Office 866-523-1603

Fax 713-523-4159

Counsel for Holcombe, Ramsey, Curnow
& Macias

/s/ Daniel J.T. Sciano

Daniel J.T. Sciano

DSciano@tsslawyers.com

Texas Bar No. 17881200

Tinsman & Sciano

10107 McAllister Freeway

San Antonio, TX 78216

Office 210-225-3121

Fax 210-225-6235

Counsel for Amador

/s/ Daniel Barks

Daniel D. Barks, *pro hac vice*

ddb@speiskrause.com

Speiser Krause, P.C.

5555 Glenridge Connector, Suite 550

Atlanta, GA 30342

Office 571-814-3344

Fax 866-936-6382

Counsel for Holcombe

/s/ Mark Collmer

Mark W. Collmer

drcollmer@aol.com

Texas Bar No. 04626420

Collmer Law Firm

3700 Montrose

Houston, TX 77006

Office 713-337-4040

Counsel for Holcombe

/s/ Dennis Peery

Dennis Charles Peery

d.peery@tylerpeery.com

Texas Bar No. 15728750

R. Craig Bettis

cbettis@tylerpeery.com

Texas Bar No. 24040518

Tyler & Peery

5822 West IH 10

San Antonio, TX 78201

Office 210-774-6445

Counsel for Uhl

/s/ Tim Maloney

Tim Maloney

Texas Bar No. 12887380

timmaloney@yahoo.com

Paul E. Campolo

pcampolo@maloneyandcampolo.com

Texas Bar No. 03730150

Maloney & Campolo, L.L.P.

926 S. Alamo

San Antonio, TX 78205

Office (210) 465-1523

Counsel for Ramsey

/s/ George LeGrand

George LeGrand
tegrande@aol.com
Texas Bar No. 12171450
Stanley Bernstein
Texas Bar No. 02225400
LeGrand & Bernstein
2511 N. Saint Mary's St.
San Antonio, Texas 78212
Office 210-733-9439
Fax 510-735-3542
Counsel for Wall & Solis

/s/ Justin Demerath

Justin Demerath
jdemerath@808west.com
Texas Bar No. 24034415
O'Hanlon, Demerath & Castillo
808 West Ave.
Austin, TX 78701
Office 512-494-9949
Counsel for Corrigan, Braden,
Warden, Stevens, Pachal, McCain, &
Poston

/s/ Brett Reynolds

Brett T. Reynolds
btreynolds@btrlaw.com
Texas Bar No. 16795500
Brett Reynolds & Associates, P.C.
1250 N.E. Loop 420, Suite 420
San Antonio, TX 78219
(210)805-9799
Counsel for Workman, Colbath, and
Harris

/s/ Joseph M. Schreiber

Joseph M. Schreiber
joe@lawdoneright.net
Texas Bar No. 24037449
Erik A. Knockaert
erik@lawdoneright.net
Texas Bar No. 24036921
Schreiber | Knockaert, PLLC
701 N. Post Oak Rd., Suite 325
Houston, TX 77024
Phone (281) 949-8904
Fax (281) 949-8914
Counsel for Brown

/s/ Jason Webster

Jason Webster
jwebster@thewebsterlawfirm.com
Texas Bar No. 24033318
The Webster Law Firm
6200 Savoy
Suite 640
Houston, TX 77036
Counsel for Lookingbill

/s/ Marion M. Reilly

Marion M. Reilly
Hilliard Munoz Gonzales, L.L.P.
719 S. Shoreline - Ste 500
Corpus Christi, TX 78401
(361) 882-1612
361/882-3015 (fax)
marion@hmgllawfirm.com
Counsel for McMahan

/s/ Hugh Plummer

Hugh Plummer

Law Office of Thomas J. Henry

4715 Fredricksburg

San Antonio, TX 78229

(210) 585-2151

(361) 985-0601 (fax)

hplummer@tjhlaw.com

Counsel for McMahan

/s/ Diego Lopez

Diego Lopez

Anderson & Associates Law Firm

2600 SW Military Drive, Suite 118

San Antonio, TX 78224

(210) 928-9999

(210) 928-9118 (fax)

diego@diegolaw.com

Counsel for Ward

CERTIFICATE OF SERVICE

By our signatures above, we certify that a copy of Joint Motion to Extend Deadline has been sent to the following on February 16, 2022 via the Court's CM/ECF notice system.

Paul D. Stern
Daniel P. Chung
Austin L. Furman
Stephen E. Handler
Jocelyn Krieger
James G. Touhey, Jr.
U.S. Department of Justice

Clayton R. Diedrichs
James F. Gilligan
James Edward Dingivan
U.S. Attorney's Office
Western District of Texas